

**EXHIBIT “C”**

***Bowditch  
& Dewey***  
ATTORNEYS

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May 6, 2005

Sara Discepolo, Esquire  
Wilson, Elser, Moskowitz, Edelman  
& Dicker LLP  
155 Federal Street  
Boston, MA 02110

Re: **Elizabeth R. Steffenberg v. T. Gene Gilman, et al.**  
**United States District Court Civil Action No. 04-40113-FDS**

Dear Attorney Discepolo:

Enclosed please find Plaintiff Elizabeth R. Steffenberg's Answers to Defendant David M. Scoll's Second Set of Interrogatories.

Please do not hesitate to contact me if you have any questions or concerns.

Very truly yours,



Christine S. Collins

CSC/map  
Enclosures

cc: Rhonda Rittenberg, Esquire

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN,  
THE GILMAN INSURANCE  
AGENCY, INC., DAVID M. SCOLL,  
ARBOR SECURITIES, LTD.,  
ALLIANCE INVESTMENT  
MANAGEMENT, COMMONWEALTH  
FINANCIAL HOLDINGS INC.,  
FINANCIAL LINKS, INC.,  
T. GILMAN & CO., LTD.,  
AVIVA LIFE INSURANCE COMPANY,  
TRADETEK, LTD., and  
TRADETEK, LLC,

Defendants.

(Christine S. Collins BBO#639293)

**CERTIFICATE OF SERVICE**

I, Christine S. Collins, hereby certify that I have this 6<sup>th</sup> day of May, 2005 served the foregoing by mailing a copy thereof, via first class mail, postage prepaid, to the following:

Rhonda L. Rittenberg, Esquire  
Prince, Lobel, Glovsky & Tye, LLP  
585 Commercial Street  
Boston, MA 02109-1024

Sara Discepolo, Esquire  
Wilson, Elser, Moskowitz, Edelman & Dicker LLP  
155 Federal Street  
Boston, MA 02110

  
Christine S. Collins

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,	)	(BBO#639293)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
T. GENE GILMAN, STEVEN GILMAN,	)	
THE GILMAN INSURANCE	)	
AGENCY, INC., DAVID M. SCOLL,	)	
ARBOR SECURITIES, LTD.,	)	
ALLIANCE INVESTMENT	)	
MANAGEMENT, COMMONWEALTH	)	PLAINTIFF ELIZABETH R. STEFFENBERG'S
FINANCIAL HOLDINGS INC.,	)	ANSWERS TO DEFENDANT DAVID
FINANCIAL LINKS, INC.,	)	M. SCOLL'S SECOND SET OF
T. GILMAN & CO., LTD.,	)	INTERROGATORIES
FIRST ALLIED SECURITIES, INC.,	)	
PENSON FINANCIAL SERVICES, INC.,	)	
AVIVA LIFE INSURANCE COMPANY,	)	
TRADETEK, LTD., and	)	
TRADETEK, LLC,	)	
	)	
Defendants.	)	

Pursuant to Rule 33 of the Massachusetts Rules of Civil Procedure, Mrs. Steffenberg, Elizabeth R. Steffenberg ("Mrs. Steffenberg"), answers to Defendant, David M. Scoll's ("Scoll") Second Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. Mrs. Steffenberg objects to each and every interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the work product doctrine.

2. Mrs. Steffenberg objects to each and every interrogatory to the extent that it purports to establish a continuing duty to supplement, or seeks to impose a duty beyond those imposed by the Federal Rules of Civil Procedure.

3. Each of the General Objections shall be deemed to apply to each of Scoll's separate interrogatories.

### ANSWERS TO INTERROGATORIES

#### Interrogatory No. 1

Identify by title, date, author, and content any and all documents which constitute the "documentation" you state Scoll was provided from Gene Gilman "which reflected that the same companies Scoll was representing, including Gilman Insurance Agency, T. Gilman & Co., Commonwealth Financial Holdings, and Financial Links, were being used by Gene Gilman to manage the Steffenbergs' investments" according to your Supplemental Answer No. 4 to Scoll's First Set of Interrogatories.

#### Answer No. 1

Objection. Interrogatory No. 1 is vague, overly broad and unduly burdensome. Subject to and without waiving the foregoing objections and the General Objections, Mrs. Steffenberg refers Defendant to documents previously produced by Defendant to date in this action in accordance with Fed. R.Civ. P. 33(d).

Interrogatory No. 2

Identify any and all source(s) of information which form(s) the basis of your statement that "Scoll also served as a Director of Trade Tek and Commonwealth Financial Holdings for some period of time between 1998 and 2003" in your Supplemental Answer No. 8 to Scoll's First Set of Interrogatories.

Answer No. 2

Objection. Interrogatory No. 2 is vague, overly broad and unduly burdensome. Subject to and without waiving the foregoing objections and the General Objections, Mrs. Steffenberg refers Defendant to documents previously produced by Mrs. Steffenberg in this action in accordance with Fed. R.Civ. P. 33(d).

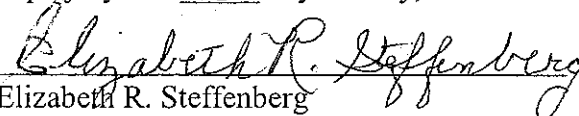
Interrogatory No. 3

Identify by title, date, author, and content any and all documents which concern, reflect or support your statement that "in or about July 1997, the Steffenbergs disclosed to Scoll that Gene Gilman had failed to repay them in accordance with the terms of a promissory note between Mr. Steffenberg and Gene Gilman, and that the final payment was due in December, 1997" in your Supplemental Answer No. 6 to Scoll's First Set of Interrogatories.

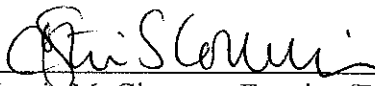
Answer No. 3

Objection. Interrogatory No. 3 is vague, overly broad and unduly burdensome. Subject to and without waiving the foregoing objections and the General Objections, Mrs. Steffenberg states that she has no such documents in her possession.

Signed under the pains and penalties of perjury this 2<sup>nd</sup> day of May, 2005.

  
Elizabeth R. Steffenberg

As to Objections:



Louis M. Ciavarra, Esquire (BBO #546481)  
Christine S. Collins, Esquire (BBO #639293)  
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Dated: May 6, 2005